

13.9082:RMB

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PEKIN INSURANCE CO. as subrogee)	
of SANDRA BLACK,)	
)	
Plaintiff,)	
)	No. 1:21-CV-3402
vs.)	
)	Hon. Judge Ronald A. Guzman
FORD MOTOR COMPANY,)	
)	
Defendant.)	

PLAINTIFF'S JURISDICTIONAL SUPPLEMENT TO THE AMENDED COMPLAINT

NOW COMES the Plaintiff, PEKIN INSURANCE COMPANY as subrogee of SANDRA BLACK (hereinafter "Pekin"), by and through its attorneys, Esp Kreuzer Cores, LLP, and as and for its Jurisdictional Supplement to the Amended Complaint filed against Defendant, FORD MOTOR COMPANY (hereinafter "Ford"), states as follows:

JURISDICTION AND VENUE

Jurisdiction is founded upon diversity of citizenship pursuant to 28 U.S.C. § 1332. Plaintiff Pekin is an Illinois corporation with its principal place of business located in the State of Illinois. Plaintiff Pekin's insured Sandra Black is a citizen of the State of Illinois. Upon information and belief, Defendant Ford is a Michigan corporation with its principal place of business located in the State of Michigan. The matter in controversy is in excess of \$75,000.00, exclusive of interest and costs.

The instant matter is a subrogation action wherein Plaintiff Pekin is partially (but almost entirely) subrogated to the rights of its insured, to the amount of \$150,446.80. Plaintiff Pekin's insured is a party to this matter for the \$500.00 amount of her deductible.

Venue is proper in this Court pursuant to 28 U.S.C. § 1391 in that a substantial part of the events, acts or omissions giving rise to this claim occurred within the Northern District of Illinois.

Respectfully submitted,

PEKIN INSURANCE COMPANY as subrogee of
SANDRA BALCK,

By: /s/ Russell M. Barnett
One of Plaintiff's attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2022, I electronically filed the foregoing Jurisdictional Supplement to the Amended Complaint pursuant to F.R.C.P. and Local 3.2 with the Clerk of the Court by using the CM/ECF system and set notice to all parties via mail.

/s/ Russell M. Barnett
Russell M. Barnett